



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

FILE: _____
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October 30, 2000

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

**RE: RESPONSES TO U.S. EPA AND OEPA COMMENTS ON THE 1999
INTEGRATED SITE ENVIRONMENTAL REPORT AND
THE INTEGRATED ENVIRONMENTAL MONITORING STATUS REPORT FOR
SECOND QUARTER 2000**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's Responses to USEPA's and OEPA's Comments on the 1999 ISERpt and DOE's Integrated Environmental Monitoring Status Report for Second Quarter 2000. Ohio EPA's comments are attached.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6543.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric U.S. EPA
Terry Hagen, Fluor Daniel Fernald
Francis Hodge, Tetrattech
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans
Manager TPSS, DERR

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**RESPONSES TO U.S. EPA AND OEPA COMMENTS ON THE 1999
INTEGRATED SITE ENVIRONMENTAL REPORT**

Comments:

1. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Appendix B.1 Pg. #: B1-8 Line #: NA Code: C
 Original Comment #: 8
 Comment: The response to this comment states, in part, that "This sampling is considered project specific process control sampling and as such, will not be routinely updated in the IEMP Annual Integrated Site Environmental or Quarterly Status Reports." The IEMP (Revision 1, Final, April 1999, section 1.3, page 1-6) states that "The IEMP will provide a reporting link for project-specific compliance and process control results, as necessary, to fulfill its responsibility for providing a comprehensive evaluation of sitewide environmental conditions." The access that OEPA has to project specific environmental sampling data is expected to be through the IEMP reports and not the individual projects. This is the interpretation OEPA has of the above statement in the IEMP and finds the response to comment #8 to be contrary to this. In future IEMP updates and reports, OEPA expects the environmental data from the projects to be included. In the proposed change in reporting format, these could be included as a note. For example, the discharge from the storm water pond addressed in this comment could be included stating the date, discharge location, TSS and TU as shown in the response to comments.

**INTEGRATED ENVIRONMENTAL MONITORING STATUS REPORT
for SECOND QUARTER 2000
51350-RP-0012, Rev. 0, Final.**

Comments:

1. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 1.2.1.1 Pg. #: 1-3 Line #: 8 Code: C
 Original Comment #
 Comment: Monitoring Well 2551 is located at the western boundary of the site monitoring well network. Groundwater samples from this well frequently contain total uranium concentrations above 20 ug/L. As such, a replacement well should be installed as near as possible to the former location of Monitoring Well 2551 to maintain the integrity of the groundwater monitoring network as the above FRL plume is now not bounded at this location.

2. Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.
 Section #: 2.2.2 Pg. #: 2-5 Line #: 25 Code: C
 Original Comment #:
 Comment: In order to provide a perspective for interpreting the Cell 2 LDS analytical

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OEPA's Comments on the RTC 99' ISERpt & 2Qrt 00' Rpt
October 30, 2000

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results discussed in the text, DOE should briefly summarize the December 1998 system malfunction that has potentially compromised the analytical data collected from the system since that time. The summary could be included as a footnote to the analytical data tables for Cells 1 and 2 (Tables 2-1 and 2-2, respectively), as appropriate. The explanation given in the 1998 Integrated Environmental Report (DOE, 1999) is very general and appears to indicate that the impacts from the system malfunction are limited to Cell 2. In the OSDF Leak Detection System Primary Containment Vessel Accumulation Rates and Uranium Concentrations Table provided in each ARWWP weekly update, however, the concentration data for Cell 1 is flagged with an explanation that it is the Cell 1 data that have been impacted by the system malfunction. A footnote for the Cell 1 and Cell 2 analytical results tables of the IEMP report would be useful for clarifying what data has been potentially impacted by the system malfunction. The explanations given in the IEMP reports and the ARWWP weekly updates should be made consistent with each other.